

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FREDKIEY HURLEY, individually,

Case No. 1:15-CV-03985-AJN

Plaintiff,

v.

LA LUCHA LLC d/b/a LA LUCHA,
a New York for profit limited liability
company and **215 AVENUE B**
REALTY LLC a New York for profit
limited liability company,

Defendants.

**MOTION FOR EXTENSION FO TIME TO FILE MOTION TO SHOW
CAUSE**

Plaintiff, FREDKIEY HURLEY, by and through the undersigned counsel, and in accordance with this Court's inherent authority hereby requests that this Court grant Plaintiff a thirty (30) day extension of time to prepare the Order to Show Cause relating to Defendants' failure to respond to Plaintiff's claims. Plaintiff is still awaiting finalization of Plaintiff's expert's report and supporting affidavit.

Defendant will not be prejudiced by an extension of time as Defendants have not entered any appearance in this action.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order providing an additional thirty (30) days to file his order to show cause.

Respectfully submitted on December 7, 2015.

By: /s/ Tara Demetriades
Tara Demetriades, Esq.
New York Bar # 4185666

ADA Accessibility Associates
1076 Wolver Hollow Road
Oyster Bay, NY 11771
t: 516.595.5009
E: TDemetriades@Aol.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiff's Motion to Reset Pretrial Scheduling Deadlines has been served via the Court's CM/ECF filing system upon all parties of record on December 7, 2015.

By: /s/ Tara Demetriades
Tara Demetriades, Esq.
New York Bar No. 4185666